

RECEIVED
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
Northern Division

Paul Pogue and
Paul Pogue, in his capacity as owner
of Surveyors Park,

Vs.

Sandy G. Robinson, an affiliate of
International Paper Company, et al.,

Cv-06-148 MHT

Plaintiffs Motion for the Court to Compel the
Alabama Forestry Commission, and its employee
Tony Chandler to Produce Useful Data

Plaintiff seeks federal court assistance in compelling defendant, Tony Chandler,
an Alabama Forestry Commission employee to produce useful data. Specifically:

1. A list and copy of each and every theft of forestry product compiled and published by the Alabama Forestry Commission from 1990 to present.
2. A copy of Surveyor Park, et al., civil action complaint with exhibits attached.
3. A list and inventory sheet of all theft of forestry products complaints that resulted in confiscation of forestry machinery and equipment.
4. A copy of each and every court appearance for which Tony Chandler participated in or aided the District Attorney(s) to obtain a criminal conviction for theft of forestry products.
5. A copy of the answers and or explanation to the inquiries as expressed and demanded in the Plaintiff's Complaint, in pertinent part, which remains unanswered.

Wherefore, the plaintiffs pray for a favorable ruling on the matter.

 301 Kahn Street, Montgomery, Alabama 36104

Certificate Of Mailing

I hereby certify that I have served a true and correct copy of the foregoing on the defendants on this the 30th day of October, 2006, by placing same in the United States Mail, first class postage prepaid and properly addressed as follow:

TO:

-Mr. Charles T. Conway
State of Alabama Employee
Alabama State Forestry Commission Building
P.O. Box 302550
Montgomery, Alabama 36130

FOR:

-State of Alabama Employee
Tony Chandler
-State of Alabama Employee
Danny Clark

